



May 18, 1992

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~~Environmental Restoration~~
Division

Reply To
Attn Of: HW124

Mr. Jerry Lyle
Acting Deputy Assistant Manager
Environmental Restoration & Waste Management
U.S. Department of Energy
Idaho Operation Office
785 DOE Place
Idaho Falls, Idaho 83402

Re: INEL WAG 7 - Comments on *Draft Scope of Work for the Track 2 Investigation of OU 7-01: Subsurface Disposal Area Soil Vaults*, received April 22, 1992

Dear Mr. Lyle:

EPA has reviewed the above-referenced Scope of Work for the soil vaults within the Radioactive Waste Management Complex. Due to the availability of adequate information regarding the disposal of the wastes within the vaults, EPA agrees that additional sampling is not warranted at this time and that no Sampling and Analysis Plan is required. The following comments are provided on the SOW for your consideration:

1. The conceptual site model would be clearer if it specified current (i.e., industrial) vs. potential future (e.g., industrial, residential, recreational) receptors. In the Summary Report, it may be useful to provide risk estimates for other future scenarios (e.g., industrial, recreational) in addition to the future residential scenario.
2. Figure 3 indicates that external exposure the only exposure route for intrusion into the radiation field. The CSM in Figure 3 appears to conflict with the discussion in Section 5 of Appendix A which states that contaminated soil would be available for ingestion, dermal contact, and particulate inhalation. How were these exposure routes eliminated for the future residential scenario which assumes intrusion?
3. A qualitative discussion of the actual expected rate of container failure, given the arid environment and composition of the containers/filters, could be included in the Summary Report when presenting the conservative assumption for total container failure in 100 years.
4. The Summary Report should provide a more detailed discussion regarding the screening for contaminants of concern and the identification of the WCP HEPA filters as the "worst case" source term.

5. As discussed in the May 11, 1992 conference call, revised default parameters (e.g., for effective depth to the aquifer) should be used. The default parameters were revised during the April 6-9, 1992 Track 2 guidance development meetings.

If you have any questions, please contact me or Mary Jane Nearman at 206-553-6642.

Sincerely,

my for

Wayne Pierre
INEL EPA Project Manager

cc: ✓ G. Hula, DOE-ID
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